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June 18, 2003

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington, D.C. 20554

Re: *Ex-Parte* Presentation
WT Docket No. 01-309

Dear Ms. Dortch,

On June 17, 2003, Steven G. Coston, Technical Manager for the Regulatory Projects Office of Sony Ericsson Mobile Communications (USA) Inc., Barbara Baffer, Director of Public Affairs and Regulations of Ericsson Inc, and Elisabeth H. Ross of Birch, Horton, Bittner and Cherot met with Joel Taubenblatt, Greg Guice, and Patrick Forster of the Wireless Bureau, Policy Division, Janet Sievert of the Consumer Bureau, and Julius Knapp, David Means and Dr. Rashmi Doshi of OET to discuss proposals for enabling hearing impaired consumers to use wireless mobile communications devices. This letter summarizes Sony Ericsson's presentation to the FCC Staff.

Summary

The FCC is currently considering a proposed Rule requiring all manufacturers of telephones used with the public mobile services to install T-coils in every device offered in the U.S. The measure is presented as a potential means of enabling hearing impaired consumers to use these products. Sony Ericsson is concerned that such a mandate will hinder the FCC's policy objectives established for the wireless market to promote innovation in product designs and to spur competition and technological development. Mandating T-coils in all products will not provide optimum choice to the hearing impaired and will negatively impact technologies and products offered to consumers in general. Sony Ericsson recommends that the Commission adopt a more targeted solution, such as requiring wireless device manufacturers to provide one T-coil compatible wireless device, per air-interface technology. This solution will provide hearing impaired consumers with the ability to use wireless devices that are evolving with technology, and that are integrated within the mainstream products offered to all consumers within the market. At the same time, this solution will not limit or restrict manufacturers' flexibility, creativity, and innovation to design a variety of products for all consumers.

T-Coil Integration in All Wireless Devices Will Result in Limited Consumer Choices

A Rule to require manufacturers to incorporate a T-coil component and/or related hardware components in every wireless device as a potential HAC solution, will significantly impact all product designs. As demonstrated in our meeting on June 17, including T-coil components significantly impacts hardware and design. Manufacturers will either design and develop a magnetic coil to be integrated into a transducer, or include a separate T-coil/exciter hardware component in the wireless device. This additional hardware will consume space and will require product analysis and other design decisions. Each implementation will significantly impact RF shielding, antenna functionality, and other performance metrics, thus requiring unique engineering solutions and testing for each and every product. At the same time as these hardware requirements are being considered, consumers are demanding wireless devices that provide increasing functionality, smaller product sizes, and larger displays. Moreover, manufacturers are striving to provide accessibility for consumers with visual, cognitive or other physical impairments, pursuant to the mandate of Section 255.

If manufacturers are required to install T-coils in all wireless devices, they will have to make trade-offs in product features and functions to accommodate the T-coil hardware and associated design requirements. Manufacturers will focus on magnetic coupling integration and RF interference reduction in every phone model. These necessary decisions on space allocations and design resources will limit each manufacturer's ability to reduce size of its products, to offer additional features, and to limit the eventual cost to the consumer.

For products not designed primarily for the U.S. market, this impact will be even greater. Historically, U.S. consumers have received the benefits of designs and technologies developed for other international markets because companies could share them in the U.S. marketplace without prohibitive additional design effort. If the FCC creates regulatory requirements too difficult or costly to achieve, it will discourage this beneficial technology transfer and handoff for future products and technologies. Due to the number of products manufactured primarily for non-U.S. markets, the negative impact to consumer choice could be extensive.

T-Coil Solutions Provide only Limited Accessibility to the Hearing Impaired

Consumer uses of wireless devices are changing dramatically and voice-centric functionality is becoming a reduced operating component of new devices. Devices today are being held in the hand and utilized with a headset or portable hands free device attachment. The consumers are viewing large color displays for messages, or organizing their calendars with updates, while maintaining the conversation mode of the device. Consumers are also using these wireless devices for functions such as playing MP3, polyphonic and stereo audio files and viewing video. Utilizing technologies such as Bluetooth, wireless devices are accessed from the pocket, the desk or across the room, and with such application any T-coil implementation in the device itself is of no benefit to the user.

Mandating T-coils in every wireless device will not support such applications and use cases. Moreover, a proposed mandate requiring manufacturers to integrate T-coils in every wireless device will greatly impact the innovation and creativity of the manufacturer to develop novel wireless products that require the miniaturization and design packaging necessary for enhanced Bluetooth devices, wireless wristwatches, or devices woven in clothing. In these products, component sizes and packaging are critical. The proposed mandate will likely limit the availability of these products in the U.S. and, in any event, will not function to provide the hearing impaired consumer with the benefit of these emerging technologies and use cases.

A More Tailored Solution Such as Requiring Manufacturers to Install T-Coils in One Phone Per Air-Interface Technology Is a Sustainable Solution, and Best Achieves Both the FCC's Overall Goals for the Wireless Market and for Hearing Impaired Consumers

A more tailored solution will allow manufacturers the opportunity to select products specifically for hearing impaired consumers' use, without artificially limiting product development for the general public and other disabled groups.

If the FCC mandates T-coils for one phone per technology, it will give manufacturers needed flexibility to select the best phone suited for this purpose. Manufacturers can be sure that the phone selected has the space, size and other characteristics to integrate the physical design changes needed to build in the T-coil. Hearing impaired consumers will be afforded access to mainstream products. By allowing limited T-coil implementation, manufacturers can provide such functionality in a mainstream product rather than as a separate "hearing impaired only" solution. This will foster more frequent updating of HAC compatible products in accordance with each manufacturer's standard product life cycles. Such a solution will result in increased accessibility for the hearing impaired without significantly impacting the choices for all consumers.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Elisabeth H. Ross

Elisabeth H. Ross

CC: Joel Taubenblatt
Greg Guice
Patrick Forster
Janet Sievert
Julius Knapp
David Means
Rashmi Doshi